

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

VEROBLUE FARMS USA INC.,  
PLAINTIFF

v.

LESLIE A. WULF, ET AL.,  
DEFENDANTS

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§

CIVIL ACTION No. 3:19-cv-00764-L

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AFFIDAVIT OF MICHAEL D. SCHWARTZ

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STATE OF MINNESOTA            )  
  )ss  
COUNTY OF WASHINGTON        )

Michael D. Schwartz being duly sworn upon oath, states, alleges and verifies as follows:

1. I am one of the attorneys representing Sean Maniaci in the above-captioned action.
2. Attached hereto as **Exhibit A** is a true and correct copy of VeroBlue Farms USA Inc.'s Amended Disclosure Statement for the Joint Chapter 11 Plan of Reorganization of VeroBlue Farms USA, Inc. and its Affiliated Debtors filed in the United States Bankruptcy Court for the Northern District of Iowa in Case No. 18-01297.
3. Attached hereto as **Exhibit A1** is a true and correct copy of page 10 of VeroBlue Farms USA Inc.'s Amended Disclosure Statement for the Joint Chapter 11 Plan of Reorganization of VeroBlue Farms USA, Inc. and its Affiliated Debtors filed in the United States Bankruptcy Court for the Northern District of Iowa in Case No. 18-01297.
4. Attached hereto as **Exhibit B** is a true and correct copy of Cassels Brock & Blackwell LLP's Response to Debtors' Objection to Withdrawal of Claims, Doc. No. 626 in the United States Bankruptcy Court for the Northern District of Iowa Adversary Proceeding, Case No. 19-09015.

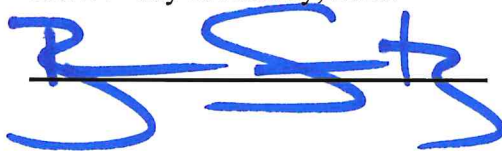
5. Attached hereto as **Exhibit C** is a true and correct copy of the October 21, 2019 Proceeding Memo and Order filed as Doc. No. 629 in the United States Bankruptcy Court for the Northern District of Iowa in Case No. 18-01297.

Further your affiant sayeth naught.

Dated: January 24, 2020

  
Michael D. Schwartz

Subscribed and sworn to before me  
this 24<sup>th</sup> day of January, 2020.





Certificate of Service: This document was served electronically on parties who receive electronic notice through CM/ECF as listed on CM/ECF's notice of electronic filing. /s/ Michael D. Schwartz